

SEMS DocID

2334588

NAME: Liquid Waste Disposal SITE NO. UA-56

ALLEGED PROBLEM: \_\_\_\_\_

ORIGINAL  
(Red)

meeting 3/11/80 with SA  
projection tentatively set 3/17/80  
check if Tim can go to SWCB &  
get info  
Acc if state negotiation going with  
Becky - get clearance  
4/9/80 dropped by George Houghton

ORIGINAL  
(Red)

7/12/80

issued a no discharge certificate by  
SWCB in October

Chickahominy River - within 15 ft of  
as named tributary of & a  
mile from the river

Eugene T. Pilee - rather low than  
net requirement

— Grant H<sub>2</sub>O wells in area

1 sample of marsh  
1 sample upstream  
1 " " downstream

1. SITE NAME: Liquid Waste Disposal Inc

OTHER COMMONLY USED NAMES: \_\_\_\_\_

ORIGINAL  
(Red)2. ADDRESS: PO BOX 4832AND/OR LOCATION: Hannover Co.P.O. BOX 29832  
Richmond, Va.  
23233Richford RdRichm, Va 232293. OWNER(S): Liquid Waste Disp Inc OPERATORS: Liquid Waste Disp. IncE.T. RILEE, JR. - PRESIDENT; G.C. KIRCHMYER,  
SEC. - TREAS. - V.P.4. PERMIT FOR HAZARDOUS WASTE? YES ( ) NO ( ☒ ) SEE REMARKS

4a. IF YES, DATE OF LAST INSPECTION? \_\_\_\_\_

4b. IF NO, ANY KNOWLEDGE OF ACTIVITIES AT THE SITE?

☐ NO☒ YESBRIEF DESCRIPTION: incineration of various organic wastes5. PREVIOUS STATE ACTION? ☒ INVESTIGATION ☒ ENFORCEMENT ☐ NONE

d issued ND. certificate

6. PRESENT USE OF SITE? ☒ ACTIVE ☐ INACTIVE☐ RESIDENTIAL - DISTANCE FROM SITE: \_\_\_\_\_☒ COMMERCIAL - DISTANCE FROM SITE: adjacent to Ward & Stancil, Inc. -☒ INDUSTRIAL - DISTANCE FROM SITE: contracting firm offices & equipment storage☐ RECREATIONAL - DISTANCE FROM SITE: \_\_\_\_\_7. IS THE SITE ACCESSIBLE? ☒ YES ☐ NO

8. TYPE OF WATER SUPPLY IN AREA?

☐ PRIVATE WELLS - DISTANCE FROM SITE \_\_\_\_\_☐ PUBLIC WELLS - DISTANCE FROM SITE \_\_\_\_\_☐ SURFACE WATER - DISTANCE FROM SITE \_\_\_\_\_9. GENERAL TOPOGRAPHY OF THE AREA? Floodplain of Chickahominy

10. UNUSUAL OR HIGHLY VULNERABLE GEOLOGIC FORMATIONS AROUND THE SITE?

☐ NO☐ YES - TYPE: \_\_\_\_\_

(OVER)

56

11.

ASSESSMENT OF ENVIRONMENTAL DAMAGE:

☐ HIGH

☐ MEDIUM

☒ LOW

☐ UNKNOWN

ORIGINAL  
(Red)

12.

POSSIBLE EPA ASSISTANCE REQUIRED: ☐ NO ☐ YES - TYPE:

☐ LAB FACILITIES

☐ TECHNICAL ASSISTANCE

☐ LEGAL

☐ JOINT INSPECTION

☐ ENFORCEMENT

☒ UNKNOWN AT THIS TIME

PREPARED BY: \_\_\_\_\_

DATE: \_\_\_\_\_

REMARKS

ORIGINAL  
(Red)

56  
A. INFORMATION REPORTED IS: ☐ Incomplete ☐ Incorrect ☒ Correct

A1. Incorrect/Incomplete Information: ( ) Site Name ( ) Address/Location ( ) Owner  
( ) Operator

A2. Operation Immediately Identifiable: ☐ Yes ☐ No ☐ Additional Effort Required

A3. Correct Information:

A4. Presumed Waste Generator: *unknown Allied Chemicals*

B. NATURE OF WASTES REPORTED: ☒ Organics ( ) Inorganics ( ) Acids ( ) Bases  
( ) Heavy Metals ( ) Trace Metals ( ) Miscellaneous  
( ) Radioactives Other \_\_\_\_\_

B1. Wastes Disposed: ☒ Known ☐ Unknown

If known, specify *various organic solvents*

B2. Classification: ☒ Hazardous ☐ Non-Hazardous ☐ Unknown ☐ Other \_\_\_\_\_

B3. Information Source: ☐ Files ☐ Other \_\_\_\_\_

C. REPORTED DISPOSAL METHOD: ( ) Landfill ( ) Lagoon ( ) Spreading ☒ Incinerator  
( ) Other \_\_\_\_\_

C1. Permit Required: ☐ Yes ☐ No By \_\_\_\_\_

Permits (Certificates) *letter* by *SAPCB*  
\_\_\_\_\_  
by \_\_\_\_\_  
\_\_\_\_\_  
by \_\_\_\_\_

56

ORIGINAL  
(Red)

C2. Potential Surface Water Discharge: ☐ Yes ☐ No

Sampled Previously: ☐ Yes ☐ No By \_\_\_\_\_

Sampled This Survey: ☐ Yes ☐ No By \_\_\_\_\_

To Be Sampled: ☐ Yes ☐ No By \_\_\_\_\_

Results Acceptable: ☐ Yes ☐ No

C3. Ground Water Monitoring: ☐ Yes ☐ No

Results Acceptable: ☐ Yes ☐ No

Feasibility of Sampling: ☐ Yes ☐ No

D. DISPOSAL TIME FRAME REPORTED: FROM 1977 TO 1977

D1. Method incineration ☒ Active ☐ Inactive ☐ Other

Method \_\_\_\_\_ ☐ Active ☐ Inactive ☐ Other

Method \_\_\_\_\_ ☐ Active ☐ Inactive ☐ Other

ORIGINAL  
(Red)

SITE: NUMBER 3214 PAGE 1 FOR THIS SITE  
LIQUID WASTE DISPOSAL, INC.  
RICHFOOD ROAD, HANOVER COUNTY, P.O. BOX 4832  
RICHMOND, VA 23229

COMPANY: COMPANY-FACILITY NUMBER 2004  
ALLIED CHEMICAL CORPORATION-  
FIBERS DIV.  
COLUMBIA PLANT  
P. O. BOX 1788 4401 ST. ANDREWS ROAD  
COLUMBIA, SC 29202  
COMPOSITION OF WASTE:

FIRST YEAR USED: 1977  
LAST YEAR USED: 1977

HUNDRED TONS: 11  
THOUSAND CUBIC YDS.: .  
THOUSAND GALLONS: .

ORGAN1

ORGAN20

ORGAN21

ORGAN22

Organics  
Oils and oil sludges  
Esters and ethers  
Alcohols

LEGEND: IF LISTED, THEN PRESENT IN WASTED. IF NOT LISTED, THEN ITEM NOT PRESENT, NOT KNOWN IF PRESENT, OR DATA MISSING.

— *Pat Corbett*  
*Thought you'd like to know.* *HT*  
Richmond Times-Dispatch, Mon., March 10, 1980 B-5.

# Plant Agrees to Safety Features

By Anne Hazard

Times-Dispatch Staff Writer

Officials of a chemical waste disposal plant near Richmond have changed their tune and now are willing to build safety features so the operation will not pose a pollution threat to the Chickahominy River.

An official of Liquid Waste Disposal Inc. indicated in November that the safety features would be too expensive and that the firm would rather shut down the disposal facility in Hanover County than pay for the necessary construction.

However, the State Water

Control Board is reviewing a Feb. 12 letter in which the firm has indicated willingness to make improvements to contain runoff or spills that might contaminate the ground water or the nearby Chickahominy River.

In fact, the firm never intended to shut down, said Eugene Rilee, president of Liquid Waste Inc. and a former Henrico County supervisor.

**THE FIRM OFFICIAL** who indicated that "was playing a little poker" to win concessions from the water board for fewer, less costly improvements, Rilee said.

Furthermore, the state strongly opposes any shut down of the waste disposal operation because of a severe shortage of such facilities for the dumping of industrial waste, Rilee said.

The facility, located a quarter mile off Richfood Road west of U.S. 301 near Mechanicsville, is referred to by water board records as a "hazardous waste-handling facility."

Although it has been in operation since 1971, the water board did not become aware of its existence until 1977.

While water board officials say it is the only chemical waste disposal facility in eastern Virginia, Rilee says it is probably one of the few such facilities on the East Coast.

Flammable liquid wastes, including sludge from oil tanks, ether from hospitals, ink waste from printing plants and chromic acid wastes, are

brought in by truck, pumped into an 18,000-gallon storage tank, agitated, then pumped into an incinerator and burned.

The facility "is poorly sited in a flood plain" and poses serious water pollution threats, according to water board records.

The facility is located next to a drainage ditch that runs into an unnamed tributary of the Chickahominy River.

**RILEE MAINTAINS** that if the firm had not handled the several million gallons of flammable waste incinerated at the site since 1971, the material "would have gone in a landfill, in a stream, [or] onto roadways, all of which [are] illegal."

"We really ought to be praised," he said.

In 1977, the firm was ordered to stop dumping wastes into the Henrico sewage treatment system after a small amount of phenol, a hazardous substance, was found in the system.

Last spring, the firm was reprimanded after a resident's complaint resulted in discovery of a small spill of what appeared to be red ink solvent, and about 60 barrels, some empty and some full of chemical wastes, that had been left outside the chain-link fence around the storage tank and incinerator.

Rilee maintains that these incidents have been blown out of proportion and that water board orders to improve safety have been followed.

Waste-handling facilities such as Liquid Waste Disposal must apply for a permit from

the water board. The permit enables the board to require structures to ensure that a spill is contained and won't reach streams and rivers.

In September 1978 the water board began trying to get Rilee's firm to apply for the permit so the construction of a berm around the incinerator and storage tank could be required.

The firm applied in May 1979. State and firm officials have said the delay was partly due to an anticipated relocation by the firm which never took place.

Rilee's Feb. 12 letter to the water board included an outline of the proposed improvements to contain spills or runoff. The design for the improvements was supposed to have been submitted by Dec. 10.

**WATER OFFICIALS** have complained repeatedly that the firm missed or sought an extension of the deadline to submit plans as well as reports of what materials it handles.

The possibility of threatening enforcement action, then relenting if the documents were received, was discussed by water board officials earlier this year.

This proved unnecessary when the Feb. 12 letter arrived, said J. Kenneth Bailey, director of the division of applied technology for the water board's Piedmont regional office.

"We try to work with the people and get them to comply voluntarily," he said. "It's just a slow process."

ORIGINAL  
(Red)



Henry see (V's) for point

rec'd 2/1/88

Richmond Times-Dispatch  
Section

BB

# Would Rather Close, Plant Official Says

By Anne Hazard

Times-Dispatch Staff Writer

The president of a chemical waste disposal plant just outside Richmond has told state officials that he would rather close the facility than make costly site improvements required by a certificate issued to the facility in October.

State Water Control Board officials said yesterday that the firm has missed a December deadline for submitting the design for improvements to contain runoff that officials fear might contaminate the land water or the nearby Chickahominy River.

Water board officials say the firm, Liquid Waste Disposal Inc., which operates an 18,000-gallon storage tank and incinerator in Hanover County, is the only chemical waste disposal facility in eastern Virginia.

Requirements for site improvements are the result of a small spill in April of what appeared to be red ink solvent.

The firm has never been routinely inspected by the state Health Department or, until April, by the water board, and it apparently has never been required to report to the state what materials it is handling.

According to Eugene T. Rilee Jr., the firm has incinerated several million gallons of industrial waste in the past eight years.

It is unknown if any of the flammable industrial waste handled by the firm was toxic.

The facility is located off Richmond Road, within 15 feet of an unnamed tributary of the Chickahominy River and about a mile from the river.

Rilee wrote a letter to the water board saying that he would rather close than meet requirements outlined in the certificate issued Oct. 26, water board engineer Michael Gregory said yesterday.

Rilee was unavailable for comment last night.

Gregory said the next step will be for state officials to confer on the matter. "We'll just have to get together and see if [Rilee] plans to meet the requirements or close," Gregory said.

The certificate also required that Liquid Waste Disposal Inc. begin submitting monthly reports of what substances it was handling. But the firm has not yet done this, Gregory said.

He said the reports should begin this month. They were not

required in November and December, he said, because the certificate specified no date for when they should begin.

Gregory said he had just assumed the firm would begin submitting reports when it submitted the designs which have not been received.

"A date probably should have been put in the certificate," Gregory said. "It was an oversight."

Gregory has said that the water board became aware of Liquid Waste Disposal Inc. only two years ago.

Another requirement of the certificate was submission of a plan for treating or disposing of runoff such as rain — a plan required under a water board program which has been in effect since 1971 for industries

Continued on Page 8, Col. 1

ORIGINAL  
(Red)

## Closing Preferred, Official Asserts

Continued From First Page

such as Liquid Waste Disposal Inc. that do not discharge into state waters.

Last summer, Rilee described as very costly and "absurd" the requirement of the certificate that the surface under the facility be sealed to prevent seepage into ground water.

A dike that has been started would have to be raised to a level ensuring containment of a "100-year flood" under terms of the certificate, and the ground under the tank and incinerator would have to be sealed with a

liner of material such as concrete, asphalt, clay or fabric.

Although the design for these improvements should have been received by the water board by Dec. 26, the firm still has a grace period, Gregory said. The length is determined on a case by case basis, he said.

The maximum grace period is about 14 days, after which a letter would be sent with a final request for either the designs or confirmation that the firm is closing, Gregory said.

After that, the water board may take legal action against the firm, he said.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.  
Philadelphia, Pa. 19106

SUBJECT: Request for Site Inspection

DATE: FEB 14 1980

FROM: Patricia M. Corbett *PMC*  
Solid Waste Management Program (3AH30)

TO: Jeffrey Hass, Acting Chief,  
Environmental Emergency Branch (3SA00)

Attached is the preliminary assessment form and additional information for VA-56 - Liquid Waste Disposal of Richmond, Virginia. The site was inspected on April 11, 1979 for PCB's. No PCB's were found during that inspection, but the State is not assured of their absence and would like EPA to pursue the investigation further. **ORIGINAL (Red)**

Please inform me of any action you plan to take so I can let the State know what is happening.



**POTENTIAL HAZARDOUS WASTE SITE  
IDENTIFICATION AND PRELIMINARY ASSESSMENT**

REGION

III

SITE NUMBER (to be assigned by HQ)

**NOTE:** This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

**GENERAL INSTRUCTIONS:** Complete Sections I and III through X as completely as possible before Section II (Preliminary Assessment). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

**I. SITE IDENTIFICATION**

<b>A. SITE NAME</b> Liquid Waste Disposal		<b>B. STREET (or other identifier)</b> Richford Rd.	
<b>C. CITY</b> Richmond	<b>D. STATE</b> VA	<b>E. ZIP CODE</b> 23229	<b>F. COUNTY NAME</b> Hanover
<b>G. OWNER/OPERATOR (if known)</b>			
<b>1. NAME</b> Mr. Brewington (facility representative during this inspection)		<b>2. TELEPHONE NUMBER</b> (804) 746-1093	
<b>H. TYPE OF OWNERSHIP</b>			
<input type="checkbox"/> 1. FEDERAL <input type="checkbox"/> 2. STATE <input type="checkbox"/> 3. COUNTY <input type="checkbox"/> 4. MUNICIPAL <input checked="" type="checkbox"/> 5. PRIVATE <input type="checkbox"/> 6. UNKNOWN			

**TE DESCRIPTION** Area surrounded by chain link fence; dimensions about 200 ft. by 300 ft.; terrain; partially diked around facility; stream in back of facility; clay-type material

<b>J. HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.)</b> EPA via State of Virginia	<b>K. DATE IDENTIFIED (mo., day, &amp; yr.)</b>
<b>L. PRINCIPAL STATE CONTACT</b>	
<b>1. NAME</b> Walter Gulevich	<b>2. TELEPHONE NUMBER</b> FTS 8-936-1754

**II. PRELIMINARY ASSESSMENT (complete this section last)**

<b>A. APPARENT SERIOUSNESS OF PROBLEM</b>	
<input type="checkbox"/> 1. HIGH <input type="checkbox"/> 2. MEDIUM <input type="checkbox"/> 3. LOW <input type="checkbox"/> 4. NONE <input checked="" type="checkbox"/> 5. UNKNOWN	
<b>B. RECOMMENDATION</b>	
<input type="checkbox"/> 1. NO ACTION NEEDED (no hazard)	<input type="checkbox"/> 2. IMMEDIATE SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: _____ b. WILL BE PERFORMED BY: _____
<input checked="" type="checkbox"/> 3. SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: _____ b. WILL BE PERFORMED BY: _____	<input type="checkbox"/> 4. SITE INSPECTION NEEDED (low priority)

**ORIGINAL  
(Red)**

<b>C. PREPARER INFORMATION</b>		
<b>1. NAME</b> Geo. Houghton	<b>2. TELEPHONE NUMBER</b> FTS 8-922-3752	<b>3. DATE (mo., day, &amp; yr.)</b> 1/31/80

**III. SITE INFORMATION**

<b>A. SITE STATUS</b>	
<input checked="" type="checkbox"/> 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)	<input type="checkbox"/> 2. INACTIVE (Those sites which no longer receive wastes.)
<input type="checkbox"/> 3. OTHER (specify): _____ (Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)	
<b>B. IS GENERATOR ON SITE?</b>	
<input checked="" type="checkbox"/> 1. NO <input type="checkbox"/> 2. YES (specify generator's four-digit SIC Code): _____	
<b>C. AREA OF SITE (in acres)</b> 200 ft. x 300 ft. 1.377 acres	<b>D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES</b>
	1. LATITUDE (deg.-min.-sec.) _____ 2. LONGITUDE (deg.-min.-sec.) _____
<b>E. ARE THERE BUILDINGS ON THE SITE?</b>	
<input type="checkbox"/> 1. NO <input checked="" type="checkbox"/> 2. YES (specify): shack used for office	

# IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

<input checked="" type="checkbox"/> A. TRANSPORTER	<input checked="" type="checkbox"/> B. STORER	<input checked="" type="checkbox"/> C. TREATER	<input checked="" type="checkbox"/> D. DISPOSER
1. RAIL	1. PILE	1. FILTRATION	1. LANDFILL
2. SHIP	2. SURFACE IMPOUNDMENT	2. INCINERATION	2. LANDFARM
3. BARGE	<input checked="" type="checkbox"/> 3. DRUMS	3. VOLUME REDUCTION	3. OPEN DUMP
<input checked="" type="checkbox"/> 4. TRUCK	<input checked="" type="checkbox"/> 4. TANK, ABOVE GROUND	4. RECYCLING/RECOVERY	4. SURFACE IMPOUNDMENT
5. PIPELINE	5. TANK, BELOW GROUND	5. CHEM./PHYS. TREATMENT	5. MIDNIGHT DUMPING
6. OTHER (specify):	6. OTHER (specify):	6. BIOLOGICAL TREATMENT	<input checked="" type="checkbox"/> 6. INCINERATION
		7. WASTE OIL REPROCESSING	7. UNDERGROUND INJECTION
		8. SOLVENT RECOVERY	8. OTHER (specify):
		9. OTHER (specify):	

## E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

Waste stored in large tank (18,000 gal.) and drums. Test for compatibility of wastes consists of mixing two chemicals in beakers.

## V. WASTE RELATED INFORMATION

### A. WASTE TYPE

☐ 1. UNKNOWN ☒ 2. LIQUID ☐ 3. SOLID ☐ 4. SLUDGE ☐ 5. GAS

ORIGINAL  
(Red)

### B. WASTE CHARACTERISTICS

☒ 1. UNKNOWN ☐ 2. CORROSIVE ☐ 3. IGNITABLE ☐ 4. RADIOACTIVE ☐ 5. HIGHLY VOLATILE  
☐ 6. TOXIC ☐ 7. REACTIVE ☐ 8. INERT ☐ 9. FLAMMABLE

☒ 10. OTHER (specify): industrial wastes

### C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

Unknown

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
(1) PAINT, PIGMENTS	<input checked="" type="checkbox"/> (1) OILY WASTES	<input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS	<input checked="" type="checkbox"/> (1) ACIDS	<input checked="" type="checkbox"/> (1) FLYASH	<input checked="" type="checkbox"/> (1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER (specify):	(2) NON-HALOGENATED SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER (specify):	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify):
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			(11) OTHER (specify):		

## V. WASTE RELATED INFORMATION (continued)

AT SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

Storage of liquid waste and no apparent spill prevention plan

## 4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

Liquid is dropped through an opening in the top of a pipe, and a flame is shot through. Pipe open on both ends, with wall a few feet from one end.

## VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH	X			
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				ORIGINAL (Red)
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER				
8. CONTAMINATION OF SURFACE WATER	X			
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR	X			
12. NOTICEABLE ODORS	X			
13. CONTAMINATION OF SOIL	X			
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION	X			
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS				
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER (specify):				

## VII. PERMIT INFORMATION

## A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

- ☐ 1. NPDES PERMIT    ☐ 2. SPCC PLAN    ☒ 3. STATE PERMIT (specify): Air - old source  
☐ 4. AIR PERMITS    ☐ 5. LOCAL PERMIT    ☐ 6. RCRA TRANSPORTER  
☐ 7. RCRA STORER    ☐ 8. RCRA TREATER    ☐ 9. RCRA DISPOSER  
☐ 10. OTHER (specify): \_\_\_\_\_

## B. IN COMPLIANCE?

- ☐ 1. YES    ☐ 2. NO    ☒ 3. UNKNOWN

4. WITH RESPECT TO (list regulation name &amp; number): \_\_\_\_\_

## VIII. PAST REGULATORY ACTIONS

- ☒ A. NONE by EPA    ☐ B. YES (summarize below)

ORIGINAL  
(Red)

## IX. INSPECTION ACTIVITY (past or on-going)

NONE

- ☒ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION
PCB inspection	4/11/79	EPA	Samples taken; found 42.6 ppm Aroclor 1016 and 1.72 ppm Aroclor 1260

## X. REMEDIAL ACTIVITY (past or on-going)

- ☒ A. NONE    ☐ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.

Facility receives waste from: Allied Chemical, Reynolds Metals, Virginia Folding Box, Haskall Chemical Co., Suffolk Chemical

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region III, Annapolis Field Office

*Chuck: Supp -*

PCB 79-046

DATE: July 26, 1979  
SUBJECT: PCB Results, Liquid Waste Oil, Richmond, Virginia

FROM: George H. Houghton (3SA21)  
Engineering Technician *GH*  
TO: Bruce Smith (3EN21)  
Chief, Delmarva - DC Section *BS*  
THRU: Leo J. Clark (3SA21)  
Chief, Engineering Section *LJC*

RECEIVED

AUG 06 1979

*JP*

ORIGINAL  
(Red)

The subject facility was sampled for PCB's on April 11, 1979. The results are as follows:

<u>Time</u>	<u>Location</u>	<u>Results (ppm)</u>
1045	Ground around furnace pump	42.6 Aroclor 1016
1110	Over flow bucket at fill line	1.72 Aroclor 1260

If there are any questions, please call me at 8-922-3752.

Region III, Annapolis Field Office

DATE: April 13, 1979

SUBJECT: PCB Inspection - Liquid Waste Disposal, Richmond, Virginia, Phone Number 804/746-1093

FROM: George H. Houghton (3SA21) *GH*  
Engineering Technician, Annapolis Field Office

TO: Walter Lee (3EN20)  
Water Enforcement Branch

THRU: Leo J. Clark (3SA21) *LJC*  
Chief, Engineering Section  
Annapolis Field Office

*79-46*

On April 11, 1979 George Houghton and Ronald Jones for EPA/Annapolis Field Office conducted an inspection at the subject facility for PCB's. The letter of authority in possession by the inspectors incorrectly stated the facility's name as "Liquid Industrial Waste Disposal". If the above name is correct the inspectors could not find the proper facility. The plant contact was Mr. C.R. Brewington. Mr. Brewington stated that this company accepts only solvent waste from various local industries, and to his knowledge there were no PCB's in this waste. The waste received, either in 55 gallon drums or by tank truck, is burned in an incinerator on site. The incinerator consists of a propane burner and a large cylindrical combustion chamber laying horizontally along the ground with no stack (about 8-10 feet in diameter and 20 feet long). The liquid waste is stored in an 18,000 gallon above ground storage tank. There is a low level dike around 2 sides of this facility. The drums were not labeled for the most part; the only label observed was 'used thinner'. ORIGINAL (Red)

Mr. Brewington also noted that this company does not collect waste from power companies, transformer manufacturers, etc. The industrial waste is hauled from the following companies:

- (1) Allied Chemical
- (2) Reynolds Metals
- (3) Virginia Folding Box
- (4) Haskell Chemical Company
- (5) Suffolk Chemical

Two samples were taken during this inspection:

- (1) ground sample - near furnace pump
- (2) liquid sample - from catch bucket at unloading point from tank truck

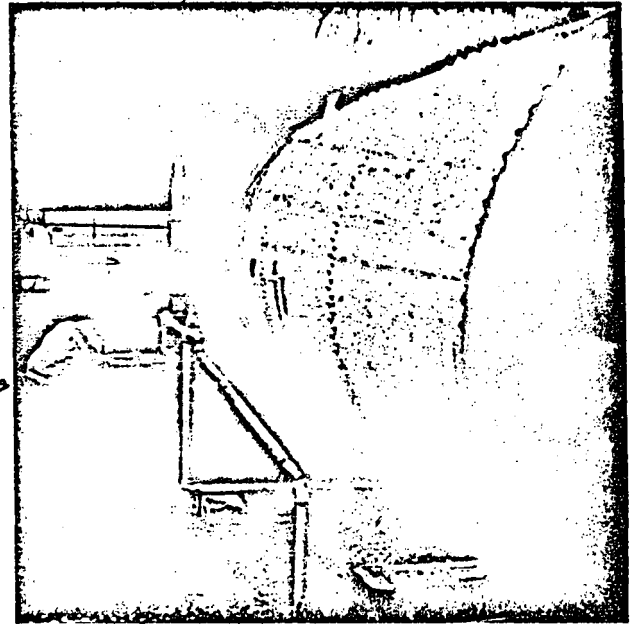
The results will be forwarded when available.

Photographs attached.





Liquid Sample  
4-11-79



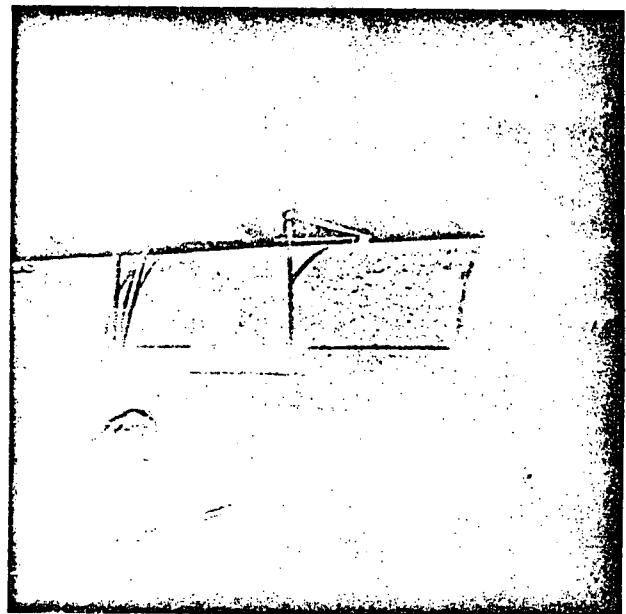
GROUND SAMPLE  
NEXT TO INCINERATOR  
4-11-79 ORIGINAL  
(Red)

## Liquid Waste Disposal

Richmond, VA



DRUMS WITH LIQUID WASTE  
4-11-79



STORAGE TANK  
18,000 GAL  
4-11-79

SITE: NUMBER 3214 PAGE 1 FOR THIS SITE  
LIQUID WASTE DISPOSAL, INC.  
RICHFOOD ROAD, HANOVER COUNTY, P.O. BOX 4832  
RICHMOND, VA 23229

COMPANY: COMPANY-FACILITY NUMBER 2004  
ALLIED CHEMICAL CORPORATION-  
FIBERS DIV.  
COLUMBIA PLANT  
P. O. BOX 1788 4401 ST. ANDREWS ROAD  
COLUMBIA, SC 29202  
COMPOSITION OF WASTE:

ORIGINAL  
(Red)

FIRST YEAR USED: 1977  
LAST YEAR USED: 1977

HUNDRED TONS: 11  
THOUSAND CUBIC YDS.: .  
THOUSAND GALLONS: .

ORGAN1

ORGAN20

ORGAN21

ORGAN22

LEGEND: IF LISTED, THEN PRESENT IN WASTED. IF NOT LISTED, THEN ITEM NOT PRESENT, NOT KNOWN IF PRESENT, OR DATA MISSING.

SITE: NUMBER 3232 PAGE 1 FOR THIS SITE  
INCINERATOR  
HANOVER COUNTY  
X-----,VA X----

COMPANY: COMPANY-FACILITY NUMBER 2005  
ALLIED CHEMICAL CORPORATION-  
FIBERS DIV.  
CHESTERFIELD PLANT.  
P.O. BOX 831  
HOPEWELL,VA 23860  
COMPOSITION OF WASTE:  
ACID1

ORIGINAL  
(Red)

FIRST YEAR USED: 1975  
LAST YEAR USED: 1976

HUNDRED TONS: 3  
THOUSAND CUBIC YDS.: .  
THOUSAND GALLONS: .

ORGAN1

ORGAN17  
INORG1  
MISC1

ORGAN18  
INORG2

ORGAN11

MISC3

ORGAN12  
ORGAN20

ORGAN21

ORGAN6  
ORGAN14  
ORGAN22

ORGAN15  
ORGAN23

ORGAN16

LEGEND: IF LISTED, THEN PRESENT IN WASTED. IF NOT LISTED, THEN ITEM NOT PRESENT, NOT KNOWN IF PRESENT, OR DATA MISSING.